

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

OCT 12 2004

Federal Communications Commission
Office of Secretary

_____)	
In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility With Enhanced 911)	
Emergency Calling Systems)	
)	
Amendment of Parts 2 and 25 to Implement)	IB Docket No. 99-67
the Global Mobile Personal)	
Communications by Satellite (GMPCS))	
Memorandum of Understanding and)	
Arrangements; Petition of the National)	
Telecommunications and Information)	
Administration to Amend Part 25 of the)	
Commission's Rules to Establish Emissions)	
Limits for Mobile and Portable Earth)	
Stations Operating in the 1610-1660.5 MHz)	
Band)	
_____)	

DOCKET FILE COPY ORIGINAL

To: Chief, International Bureau

**911 CALL CENTER PRE-IMPLEMENTATION STATUS REPORT OF
IRIDIUM SATELLITE LLC**

Pursuant to the Commission's Second Report and Order in the above-captioned proceeding, Iridium Satellite LLC ("Iridium") hereby provides its 911 Pre-Implementation Status Report.¹ Iridium is a wholesale provider of Mobile Satellite Services ("MSS"). By this report Iridium certifies that it is diligently working to meet the FCC's February 11, 2005 deadline for 911 call center deployment.

¹ See *Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, Second Report and Order, CC Dkt. No. 94-102, IB Dkt. No. 99-67, FCC 04-201 (rel Aug. 25, 2004); see also *International Bureau Announces Procedures for Filing Mobile Satellite Service 911 Call Center Pre-Implementation Status Reports*, Public Notice, DA 04-3064, Report No. SPB-210 (rel. Sept. 24, 2004).

A. Iridium's Identification Information

Corporate Headquarters:

Iridium Satellite LLC
6701 Democracy Blvd., Suite 500
Bethesda, MD 20817
(301) 571-6200

Filer of Pre-Implementation Status Report and Contact Person on 911 Issues:

Olga Madruga-Forti
Vice President - Regulatory and Legal
Iridium Satellite LLC
6701 Democracy Blvd., Suite 500
Bethesda, MD 20817
(301) 571-6200

B. Description of Iridium's Coverage Area

The Iridium system is a satellite-based Personal Communications Service (PCS) or Mobile Satellite Services (MSS) system, supporting global, wireless digital communications. Iridium's service covers the entire United States (including Alaska, Hawaii, Puerto Rico, Guam, the U.S. Virgin Islands, and U.S. territorial waters).

C. Basic Call Center Information Including Location and Plans for Routing Emergency Calls to Public Safety Answering Points (PSAPs)

Iridium plans to outsource its emergency 911 call center services to a vendor. When an Iridium subscriber dials 911, the Iridium switch will transfer the call via existing PSTN interconnections to the vendor's emergency call center.

At the emergency call center the vendor's operator will answer the call, ask the subscriber for his/her name, callback number, location and a description of the situation requiring emergency service. The operator, using the PSAP database, will then transfer the call to the appropriate PSAP.

D. Description of How Iridium's Call Center Features Will Be Communicated to Customers

As a wholesale provider of MSS, Iridium will communicate the availability of emergency call handling services in the U.S. to our service providers by written communication, via e-mail, and using Iridium's Extranet, an Internet-based

communications facility. Iridium's service providers will then be required to communicate the availability of the service and features to end-users.

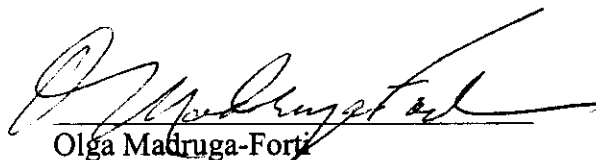
E. Implementation Requirements for Deployment

Iridium continues to assess the availability of the PSAP database and operator guidelines for MSS carriers and/or vendors. The availability of the database and guidelines are essential to deployment of 911 call center service.

Conclusion

Iridium is progressing in its procurement process towards timely deployment of 911 call center service. Iridium is evaluating the capabilities of all potential vendors. Should you have any questions regarding the information provided, please do not hesitate to contact the undersigned.

Respectfully submitted,



Olga Madruga-Fort
Vice President - Regulatory and Legal
Iridium Satellite LLC
6701 Democracy Blvd., Suite 500
Bethesda, MD 20817
(301) 571-6227

October 12, 2004

cc: Marlene H. Dortch, Secretary